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9 **Attorneys for Plaintiff**
10 **Garden City Boxing Club, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**

13 **Garden City Boxing Club, Inc.,**

14 **Plaintiff,**

15 **vs.**

16 **Hai Phuc Nguyen, et al.**

17 **Defendants.**

18 **CASE NO. 05-cv-00384 WBS JFM**

19 **STIPULATION TO AMEND COMPLAINT**
20 **AND RESCHEDULE STATUS**
21 **CONFERENCE AND ORDER (Proposed)**

22 **IT IS HEREBY STIPULATED** by and between the Parties hereto through their respective
23 attorneys of record, that Plaintiff may file an Amended Complaint, a true and correct copy of which
24 is attached hereto, and made part hereof as Exhibit 1.

25 **FURTHER**, the Parties hereto by and through their counsel, hereby agree, stipulate, and
26 respectfully request that this Honorable Court continue the Status Conference, in this action (presently set
27 for Monday, June 20, 2005, at 9:00 a.m.) to a new date of Monday, August 29, 2005, at 9:00 a.m.

28 Such a request is respectfully requested in order that the Plaintiff may file and serve its Amended
Complaint, dismiss Defendant Hai Phuc Nguyen, from the above entitled-action, serve the new party
defendant Antoine Sandifer, and the new party defendant may have the opportunity to respond to
Plaintiff's amended and original complaints, may thereafter participate in the preparation of the Joint
Status Report to be filed in this action and may later appear and participate at the Status Conference to be
conducted in this action.

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1 **WHEREFORE, IT IS HEREBY STIPULATED BY AND RESPECTFULLY**
2 **REQUESTED BY THE PARTIES HERETO** that this Honorable Court continue the Status
3 Conference in this action from 9:00 a.m., Monday, June 20, 2005, to 9:00 a.m., Monday, August 29,
4 2005, in order that that the Plaintiff may file its Amended Complaint, effectuate service of suit
5 papers, await the filing of a responsive pleading by the new party Defendant, Antoine Sandifer
6 concur with Defendant and or his counsel, and thereafter file a Joint Status Report (or in the
7 alternative file its Request for Entry of Default with the Clerk of the Court)

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11 Dated: June 7, 2005

12 **LAW OFFICES OF THOMAS P. RILEY, P.C.**

13 By: Thomas P. Riley
14 Attorneys for Plaintiff
15 GARDEN CITY BOXING CLUB, INC.
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18 Dated:

19 **KERR LAW GROUP**

20 By: Bruce Kerr, Esquire
21 Attorneys for Defendant
22 Hai Phuc Nguyen
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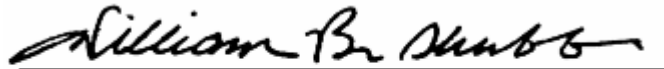
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ORDER

It is hereby **ORDERED** that the Status Conference in 05-cv-00384 WBS JFM styled *Garden City Boxing Club, Inc. v. Hai Phuc Nguyen, et al.*, is hereby continued from 9:00 a.m., Monday, June 20, 2005, to 9:00 a.m., Monday, August 29, 2005.

IT IS SO ORDERED:

Dated: June 13, 2005



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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PROOF OF SERVICE (BY FAX & FIRST CLASS MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is One California Plaza, 300 South Grand Avenue, Suite 2670, Los Angeles, California 90071. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 7, 2005, I served:

**STIPULATION TO AMEND COMPLAINT AND RESCHEDULE STATUS
CONFERENCE AND ORDER (Proposed)**

On all parties in said cause by transmitting a true copy thereof by Facsimile and by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Bruce Kerr, Esquire

Attorneys for Defendant

KERR LAW GROUP

2240 Douglas Blvd., Suite 290
Roseville, CA 95661

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on June 7, 2005, at Los Angeles, California.

Dated: June 7, 2005

INESA MAMIDJANYAN